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Attorneys for Plaintiffs
TRENDTEX FABRICS, LTD. and
TRENDTEX HOLDING, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF HAWAII

TRENDTEX FABRICS, LTD., a Hawaii
Corporation; and TRENDTEX
HOLDING, LLC, a Hawaii limited
liability company;

Plaintiff,

vs.

NTKN, INC., a Hawaii corporation;
HUNG KY, an individual; SHAKA
TIME, INC., a Hawaii corporation;
LEILANI'S ATTIC, INC., a California
corporation; and HAWAII
HANGOVER, LLC, a Missouri limited
liability company; MARK MADL, an

Case No. 1:22-cv-00287-MWJS-KJM

PLAINTIFFS' MOTION FOR
PARTIAL SUMMARY JUDGMENT

Trial Judge: Hon. Micah W.J. Smith

Trial Date: July 29, 2024

individual D/B/A CITIES FASHION; Defendants.
NTKN, INC., a Hawaii corporation, Counterclaim Plaintiff, vs. TRENDTEX FABRICS, LTD., a Hawaii corporation, Counterclaim Defendant.

Plaintiffs TRENDTEX FABRICS, LTD. and TRENDTEX HOLDING, LLC (collectively, “Plaintiffs”), by and through their attorneys The DuBoff Law Group, P.C. and Go Law Office, LLLC, hereby respectfully move the Court for an order granting partial summary judgment as to the First, Second, Third, Fourth, Fifth, Sixth, Eleventh, Thirteen, Fourteenth, Fifteenth, Seventeenth, and Twenty-Second Claims for Relief from Plaintiffs’ Second Amended Complaint. Plaintiffs bring this motion because there is no probative evidence to dispute that (1) the textile print surface designs in question are original works of art owned by Plaintiffs and (2) Defendants have infringed those copyrights by selling garments displaying those designs in colorways not obtained from Plaintiffs.

This Motion is made pursuant to Fed. R. Civ. P. 7(b) and 56 and is supported by the Memorandum in Support, the Concise Statement of Facts, the Declaration of Leonard D. DuBoff, the Declaration of Dwight Hamai, the

Declaration of Carlos Benitez, the Declaration of Deborah Young, the Exhibits attached thereto, and the records and files herein.

RESPECTFULLY SUBMITTED this 1st day of March 2024.

/s/ Leonard D. DuBoff
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